

# MEMO ENDORSED

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VIA FACSIMILE

August 31, 2007

Hon. Kenneth M. Karas  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
Fax# 212-805-7968

RE: *United States v. Douglas Shyne, et. al.*  
S4 05 Cr. 1067 (KMK)

Dear Judge Karas:

I am the attorney for Naresh Pitambar ("Pitambar"), one of the defendants in the above-referenced indictment. I write to request until September 4, 2007 to file a reply to the government's response to my Rule 29 motion. My reply is currently due today. The reason for this request is that I have a new matter that requires my immediate attention, and I will not be able to complete my reply today. I have made one previous request for an extension of time to file my reply that the Court granted. I assure the Court that I will not make any further requests of this nature.

I spoke to AUSA Dan Levy, and he indicated he consents to this request. As the two of the other co-defendants who went to trial do not have a pending Rule 29 motion, I did not confer with them. As Mr. Nooter already filed his reply, I did not consult him either. Thank you for your consideration in this matter.

Respectfully submitted,

Denis Kelleher (DK-1414)

Cc: AUSA Dan Levy (via email)

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Granted.

SO ORDERED

KENNETH M. KARAS U.S.D.J.

9/31/07